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May 26, 2020

Magistrate Judge Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza E
Brooklyn, New York 11201

Re: *Encarnacion v. BMC Builder Corp., et al.*, Case No. 19-Cv.-2582 (DLI)(SMG)

Dear Judge Gold,

Our office represents Defendants, BMC Builder Corp. and Walter Florentin, in the above-referenced matter. The parties have a discovery deadline of today, May 26, 2020. Unfortunately, the current pandemic has prevented Defendants from completing Plaintiff's deposition. Similarly, Covid-19 limited my ability to request this extension sooner.

The Defendants request a 30-day extension of the discovery deadline to June 26, 2020, within which to complete Plaintiff's deposition. This is the Defendants' second request for an extension of the discovery deadline. Plaintiff's counsel has been consulted and does not oppose this request.

Thank you for your consideration.

Very truly yours,

/s/ Martin E. Restituyo
Martin E. Restituyo, Esq.